

**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

**G. MARIE NEWBY, Individually, and)
as Administratrix of THE ESTATE OF)
TERRY CHILDRESS,)**

Plaintiffs,)

v.)

**CORECIVIC OF TENNESSEE, LLC,)
as Owner and Operator of TROUSDALE)
TURNER CORRECTIONAL CENTER,)
DAMON HININGER, STEVE CONRY,)
RAYMOND BYRD, and SHAWNA)
CURTIS,)**

Defendants.)

**Civil Action Number 3:22-CV-93
Chief Judge Waverly D. Crenshaw, Jr.
Magistrate Judge Jeffery S. Frensley
Jury Demand**

**DEFENDANT SHAWNA CURTIS' STATEMENT
OF UNDISPUTED MATERIAL FACTS**

Defendant Shawna Curtis ("Curtis") respectfully submits this Statement of Undisputed Material Facts in support of her Motion for Summary Judgment. Curtis submits that the following facts are undisputed for the purposes of her Motion for Summary Judgment:

1. Curtis is a former employee of CoreCivic of Tennessee, LLC ("CoreCivic"), and she specifically was employed by the company from January 14, 2019, through March 17, 2020. She worked at the Trousdale Turner Correctional Center ("Trousdale") during this timeframe. (Declaration of Shawna Curtis ¶ 2).

RESPONSE:

2. Curtis was not employed by CoreCivic on December 8, 2020, she did not work at Trousdale on December 8, 2020, and she did not classify Tymothy Willis (“Willis”) on December 8, 2020. (*Id.* ¶ 3).

RESPONSE:

3. A true and correct copy of Curtis’ Separation Notice from CoreCivic is attached to the Declaration of Shawna Curtis as Exhibit A. (*Id.* ¶ 5, Exhibit A).

RESPONSE:

Respectfully submitted,

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Conry, Raymond Byrd, and Shawna Curtis*

CERTIFICATE OF SERVICE

I certify that a true and exact copy of the foregoing has been served upon Filing Users via the electronic filing system and on other counsel via U. S. Mail, first-class postage prepaid, this July 19, 2022, on the following:

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